

## DRAFT 9-8-2021

In support of a productive discussion on information sharing among Red Hill AOC parties, below is a set of examples in which regulatory agencies have observed the Navy/DLA withholding information, being unresponsive to concerns, or otherwise acting in a way that hinders open communication.

- May 6<sup>th</sup> release investigation preliminary findings have not been shared as of September 8, 2021 despite repeated requests for information
- Actions the Navy has taken to prevent another incident such as the May 6 expansion joint failure are unknown.
- Information surrounding the selection of GTTNA for a secondary containment feasibility study and information about the GTTNA technology are unknown.
- Use of Navy conclusions from other AOC sections to support the TUA 1A selection is not appropriate if regulators have on record comments disagreeing with some of these lines of evidence. Examples include referring to Navy holding capacity model and natural source zone depletion conclusions and GWFM capture zone conclusions. Further, these lines of evidence, if valid, would support other TUA options as well.
- Navy uses McHugh et al 2020 study on Natural Source Zone Depletion that draw conclusions about the "holding capacity" under the facility as a remediation solution for hypothetical small facility releases. DQH disputes the study's findings.
- Regulators have brought forward concerns about potential corrosion due to water infiltration and the Navy hasn't been responsive.
- Navy has not made clear statements on the level of risk the Navy/DLA is willing to accept at their facility.

**Commented [ILK1]:** These are certainly examples, but the Navy has a tendency to manage items as checklists. If we give them an example, I think if we use one well developed one. Took this from the TUA notes.